

EXHIBIT G1

UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEW JERSEY

**IN RE: JOHNSON & JOHNSON TALCUM
POWDER PRODUCTS MARKETING,
SALES PRACTICES, AND PRODUCTS
LIABILITY LITIGATION**

MDL NO. 2738 (FLW) (LHG)

***THIS DOCUMENT RELATES TO ALL
CASES***

**PLAINTIFFS' STEERING COMMITTEE'S RESPONSE AND OBJECTIONS TO THE
NOTICE OF ORAL AND VIDEOTAPED DEPOSITION OF GHASSAN M. SAED, PH.D
AND DUCES TECUM**

The Plaintiffs' Steering Committee ("PSC") responds and objects to Defendants' Notice of Oral and Videotaped Deposition of Ghassan M. Saed, Ph.D and Duces Tecum as follows:

GENERAL OBJECTIONS

The PSC objects to Defendants' Notice of Oral and Videotaped Deposition of Ghassan M. Saed, Ph.D and Duces Tecum to the extent that it exceeds the scope of discovery or seeks to place obligations on the PSC or Dr. Saed that are not required under the Federal Rules of Civil Procedure, Case Management Order No. 11, or any other Order of the Court. The PSC further objects to Defendants' request that Dr. Saed produce certain documents "no later than two (2) weeks from date of service of [the] Notice." Pursuant to applicable federal rules, "[t]he notice to a party deponent may be accompanied by a request under Rule 34 to produce documents and tangible things *at the deposition.*" See Fed. R. Civ. P. 30(b)(2) (emphasis added).

The PSC objects to every request in Schedule A that seeks documents or other information that has been previously produced to Defendants on the grounds that it is duplicative, unduly burdensome, and imposes undue expense on the PSC or Dr. Saed. The PSC further objects to any request that seeks the production of publicly available documents or documents previously produced

by Defendants. The PSC further objects to any request that seeks documents or other information included in, referenced or attached to Dr. Saed's expert report because it is duplicative and equally available to Defendants. Lastly, the PSC objects to any request that seeks the production of documents protected by either confidentiality agreements or protective orders in other litigations.

Any documents produced or referenced in response to Defendants' request in Schedule A are produced subject to these general objections as well as the specific objections stated below.

RESPONSES AND OBJECTIONS TO DOCUMENTS REQUESTED

1. A copy of the abstract co-authored by you (Harper/Saed 2018 Abstract), which was accepted for publication at the Society of Gynecologic Oncology 2019 proceedings.

RESPONSE: The PSC incorporates by reference the general objections stated above. The PSC further objects on the grounds that the 2018 Abstract has previously been produced to Defendants.

2. All primary data underlying the experiments described on pages 13 to 21 of Your expert report in this MDL (the "report"), under the heading "Findings from recent research from my laboratory relating to the effects of talcum powder exposure in vitro," including but not limited to, the following:

A. A list of all experimental studies performed.

RESPONSE: The PSC incorporates by reference the general objections stated above. The PSC further objects to this request to the extent it is unduly burdensome and requests that Dr. Saed prepare documents in response to the request. Notwithstanding the aforementioned, Dr. Saed will produce at his deposition copies of all laboratory notebooks related to the research referred to on pages 13-21 of his report.

B. Experimental outlines for all experimental studies performed.

RESPONSE: The PSC incorporates by reference the general objections stated above. Notwithstanding the aforementioned, Dr. Saed will produce at his deposition copies of all laboratory notebooks related to the research referred to on pages 13-21 of his report.

C. A specific protocol for each experiment performed, including:

1. The number and type of cells seeded in each experiment;

RESPONSE: The PSC incorporates by reference the general objections stated above. Notwithstanding the aforementioned, Dr. Saed will produce at his deposition copies of all laboratory notebooks related to the research referred to on pages 13-21 of his report.

2. The number of cells at the time of treatment with talc or other agents;

RESPONSE: The PSC incorporates by reference the general objections stated above. Notwithstanding the aforementioned, Dr. Saed will produce at his deposition copies of all laboratory notebooks related to the research referred to on pages 13-21 of his report.

3. The amount of time elapsed from the treatment of cells with talc or other agent and the harvesting of cells or cell media/supernatant;

RESPONSE: The PSC incorporates by reference the general objections stated above. Notwithstanding the aforementioned, Dr. Saed will produce at his deposition copies of all laboratory notebooks related to the research referred to on pages 13-21 of his report.

4. The duration of treatment with talc or other agents;

RESPONSE: The PSC incorporates by reference the general objections stated above. Notwithstanding the aforementioned, Dr. Saed will produce

at his deposition copies of all laboratory notebooks related to the research referred to on pages 13-21 of his report.

5. The number of cells at the time of harvest.

RESPONSE: The PSC incorporates by reference the general objections stated above. The PSC further objects to this request to the extent it is vague and ambiguous. Notwithstanding the aforementioned, Dr. Saed will produce at his deposition copies of all laboratory notebooks related to the research referred to on pages 13-21 of his report.

- D. Names of personnel who conducted each study and their role on each study.

RESPONSE: The PSC incorporates by reference the general objections stated above. The PSC further objects to this request to the extent it is vague, unduly burdensome and requests that Dr. Saed prepare documents in response to the request. Notwithstanding the aforementioned, Dr. Saed will produce at his deposition copies of all laboratory notebooks related to the research referred to on pages 13-21 of his report.

- E. Copies of all laboratory notebook pages corresponding to the research referred to on pages 13-21 of the report by any and all personnel involved in these experiments.

RESPONSE: The PSC incorporates by reference the general objections stated above. Notwithstanding the aforementioned, Dr. Saed will produce at his deposition copies of all laboratory notebooks related to the research referred to on pages 13-21 of his report.

- F. Results from any and all statistical tests performed on data generated in the experimental studies described on pages 13-21 of the report, including statistical test used, p-value obtained, standard deviations, correction for multiple testing, etc.

RESPONSE: The PSC incorporates by reference the general objections stated above. The PSC further objects to this request to the extent it is vague, ambiguous and unduly burdensome. Notwithstanding the aforementioned, Dr. Saed will produce at his deposition copies of all laboratory notebooks related to the research referred to on pages 13-21 of his report.

G. All results from any and all tests performed in the experimental studies described on pages 13-21 of the report.

RESPONSE: The PSC incorporates by reference the general objections stated above. Notwithstanding the aforementioned, Dr. Saed will produce at his deposition copies of all laboratory notebooks related to the research referred to on pages 13-21 of his report.

H. A list of any data points or experimental replicates that were excluded from data analysis and the reasons for their exclusion.

RESPONSE: The PSC incorporates by reference the general objections stated above. The PSC further objects to this request to the extent it is vague, unduly burdensome and requests that Dr. Saed prepare documents in response to the request. Notwithstanding the aforementioned, Dr. Saed will produce at his deposition copies of all laboratory notebooks related to the research referred to on pages 13-21 of his report.

I. Results from any and all analytical assays performed on talcum powder samples to determine composition, including samples from Fisher Scientific and Johnson & Johnson.

RESPONSE: The PSC incorporates by reference the general objections stated above. The PSC further objects to this request to the extent it is vague, ambiguous and unduly burdensome. Notwithstanding the aforementioned, Dr. Saed will

produce at his deposition copies of all laboratory notebooks related to the research referred to on pages 13-21 of his report.

J. All graphs and figures generated from the data obtained from the experimental studies referred to on pages 13-21 of the report, including descriptive figure legends.

RESPONSE: The PSC incorporates by reference the general objections stated above. Notwithstanding the aforementioned, Dr. Saed will produce at his deposition graphs and figures related to the research referred to on pages 13-21 of his report.

K. All raw data generated in the experimental studies referred to on pages 13-21 of the report, including all standard curves, positive controls and negative controls, and including but not limited to all readings or data from:

1. quantification of number of cells, amount of RNA or amount of protein from each experimental sample;

RESPONSE: The PSC incorporates by reference the general objections stated above. Notwithstanding the aforementioned, Dr. Saed will produce at his deposition copies of all laboratory notebooks related to the research referred to on pages 13-21 of his report.

2. any and all photomicrographs of cells taken during the experiments referred to on pages 13-21 of the report;

RESPONSE: The PSC incorporates by reference the general objections stated above. Notwithstanding the aforementioned, Dr. Saed will produce at his deposition copies of all laboratory notebooks related to the research referred to on pages 13-21 of his report.

3. quantitative RT-PCR for mRNA expression of beta-actin, CAT, iNOS, GSR, GPX1, MOP, SOD2, CA-125 and any other gene whose mRNA expression level was measured;

RESPONSE: The PSC incorporates by reference the general objections stated above. Notwithstanding the aforementioned, Dr. Saed will produce at his deposition copies of all laboratory notebooks related to the research referred to on pages 13-21 of his report.

4. melting curve analyses for the above (3);

RESPONSE: The PSC incorporates by reference the general objections stated above. Notwithstanding the aforementioned, Dr. Saed will produce at his deposition copies of all laboratory notebooks related to the research referred to on pages 13-21 of his report.

5. RNA concentrations and amounts for all samples analyzed;

RESPONSE: The PSC incorporates by reference the general objections stated above. Notwithstanding the aforementioned, Dr. Saed will produce at his deposition copies of all laboratory notebooks related to the research referred to on pages 13-21 of his report.

6. protein concentrations and amounts for all samples analyzed;

RESPONSE: The PSC incorporates by reference the general objections stated above. Notwithstanding the aforementioned, Dr. Saed will produce at his deposition copies of all laboratory notebooks related to the research referred to on pages 13-21 of his report.

7. spectrophotometric readings for ELISA assays for protein concentrations and/or amounts of CAT, SOD3, GSR, GPX1, MPO, CA-125 and any other protein whose expression was measured by ELISA;

RESPONSE: The PSC incorporates by reference the general objections stated above. Notwithstanding the aforementioned, Dr. Saed will produce at his deposition copies of all laboratory notebooks related to the research referred to on pages 13-21 of his report.

8. any and all measurements related to the enzymatic activity of CAT, SOD3, GSR, GPX1, MPO and any other protein whose activity was measured;

RESPONSE: The PSC incorporates by reference the general objections stated above. Notwithstanding the aforementioned, Dr. Saed will produce at his deposition copies of all laboratory notebooks related to the research referred to on pages 13-21 of his report.

9. assays for Nitrite (NO₂-)/nitrate (NO₃-), including HPLC analyses and profiles, fluorescence readings, and any other measurements;

RESPONSE: The PSC incorporates by reference the general objections stated above. Notwithstanding the aforementioned, Dr. Saed will produce at his deposition copies of all laboratory notebooks related to the research referred to on pages 13-21 of his report.

10. any and all measurements and results from SNP genotyping assays, including specific expression levels;

RESPONSE: The PSC incorporates by reference the general objections stated above. Notwithstanding the aforementioned, Dr. Saed will produce at his deposition copies of all laboratory notebooks related to the research referred to on pages 13-21 of his report.

11. any and all measurements of cell number, cell proliferation, cell apoptosis and/or cell viability related to the experiments referred to on pages 13-21 of the report;

RESPONSE: The PSC incorporates by reference the general objections stated above. Notwithstanding the aforementioned, Dr. Saed will produce at his deposition copies of all laboratory notebooks related to the research referred to on pages 13-21 of his report.

12. any additional measurements of redox state or oxidative stress not specified above;

RESPONSE: The PSC incorporates by reference the general objections stated above. Notwithstanding the aforementioned, Dr. Saed will produce at his deposition copies of all laboratory notebooks related to the research referred to on pages 13-21 of his report.

13. any and all measurements related to tumorigenicity in animals or in humans, or transformed state in culture of the cells used in the studies referred to on pages 13-21 of the report;

RESPONSE: The PSC incorporates by reference the general objections stated above. Notwithstanding the aforementioned, Dr. Saed will produce at his deposition copies of all laboratory notebooks related to the research referred to on pages 13-21 of his report.

14. any and all studies demonstrating that the "normal" ovarian cells used in the studies referred to on pages 13-21 of the report are non-tumorigenic or non-transformed;

RESPONSE: The PSC incorporates by reference the general objections stated above. Notwithstanding the aforementioned, Dr. Saed will produce at his deposition copies of all laboratory notebooks related to the research referred to on pages 13-21 of his report.

15. measurements related to cell death and/or cell viability in experiments referred to assessing the effects of talc treatment on CA-125 levels related to the cells used in the studies referred to on pages 13-21 of the report;

RESPONSE: The PSC incorporates by reference the general objections stated above. Notwithstanding the aforementioned, Dr. Saed will produce at his deposition copies of all laboratory notebooks related to the research referred to on pages 13-21 of his report.

16. any and all measurements and/or data supporting the claim that "the CAT SNP (rs769217) . . . was induced in all normal cell lines tested and in TOV112D EOC lines", including a list of the cell lines tested that did, or did not, show this effect;

RESPONSE: The PSC incorporates by reference the general objections stated above. Notwithstanding the aforementioned, Dr. Saed will produce at his deposition copies of all laboratory notebooks related to the research referred to on pages 13-21 of his report.

17. any and all measurements and/or data supporting the claim that "all cells, except for HOSEpiC cells, manifest the SNP genotype of GPX1 (C/T) before talc treatment. Intriguingly, talc treatment reversed this SNP genotype to the normal genotype", including a list of the cell lines tested that did, or did not, show this effect;

RESPONSE: The PSC incorporates by reference the general objections stated above. Notwithstanding the aforementioned, Dr. Saed will produce at his deposition copies of all laboratory notebooks related to the research referred to on pages 13-21 of his report.

18. any and all measurements and/or data supporting the claim that "our results showed that talc treatment was associated with a genotype switch from common C/C genotype in NOS2 in untreated cells to T/T, the SNP genotype, in talc treated cells, except in

A2780 and TOV112D", including a list of the cell lines tested that did, or did not, show this effect;

RESPONSE: The PSC incorporates by reference the general objections stated above. Notwithstanding the aforementioned, Dr. Saed will produce at his deposition copies of all laboratory notebooks related to the research referred to on pages 13-21 of his report.

19. any and all measurements and/or data supporting the claim that "Collectively, these findings demonstrate that talc treatment induced gene point correspond to SNPs in locations with functional effects, thus altering overall redox balance for the initiation and development of ovarian cancer";

RESPONSE: The PSC incorporates by reference the general objections stated above. Notwithstanding the aforementioned, Dr. Saed will produce at his deposition copies of all laboratory notebooks related to the research referred to on pages 13-21 of his report.

20. any and all measurements and/or data supporting the claim that "This study has shown a dose-dependent significant increase in key pro-oxidants, iNOS, NO₂-/NO₃-, and MPO and a concomitant decrease in key antioxidant enzymes, CAT, SOD, GPX, and GSR, in all talc treated cells (both normal and ovarian cancer) compared to controls," including a list of the cell lines tested that did, or did not, show each of these effects;

RESPONSE: The PSC incorporates by reference the general objections stated above. Notwithstanding the aforementioned, Dr. Saed will produce at his deposition copies of all laboratory notebooks related to the research referred to on pages 13-21 of his report.

21. any and all measurements and/or data supporting the claim that "The mechanism by which talc alters the cellular redox and inflammatory balance involves the

induction of specific mutations in key oxidant and antioxidant enzymes that correlate with alterations in their activities", including the statistical analyses performed to demonstrate correlation;

RESPONSE: The PSC incorporates by reference the general objections stated above. Notwithstanding the aforementioned, Dr. Saed will produce at his deposition copies of all laboratory notebooks related to the research referred to on pages 13-21 of his report.

22. any and all measurements and/or data related to determining whether talc causes mutations;

RESPONSE: The PSC incorporates by reference the general objections stated above. Notwithstanding the aforementioned, Dr. Saed will produce at his deposition copies of all laboratory notebooks related to the research referred to on pages 13-21 of his report.

23. any and all DNA or RNA sequencing data, including as it may relate to evaluating whether talc causes mutations;

RESPONSE: The PSC incorporates by reference the general objections stated above. Notwithstanding the aforementioned, Dr. Saed will produce at his deposition copies of all laboratory notebooks related to the research referred to on pages 13-21 of his report.

24. any and all measurements and/or data generated in the experimental studies referred to on pages 13-21 of the report that support the claim that "Johnson's Baby Powder elicits an inflammatory response in normal ovarian and tubal cells and in ovarian cancer cells";

RESPONSE: The PSC incorporates by reference the general objections stated above. Notwithstanding the aforementioned, Dr. Saed will produce

at his deposition copies of all laboratory notebooks related to the research referred to on pages 13-21 of his report.

25. a list of all "normal ovarian and tubal cells" evaluated in the experimental studies referred to on pages 13-21 of the report;

RESPONSE: The PSC incorporates by reference the general objections stated above. The PSC further objects to this request to the extent it is unduly burdensome and requests that Dr. Saed prepare documents in response to the request. Notwithstanding the aforementioned, Dr. Saed will produce at his deposition copies of all laboratory notebooks related to the research referred to on pages 13-21 of his report.

26. a list of all assays performed in the experimental studies referred to on pages 13-21 of the report that relate to "the development or progression of ovarian cancer";

RESPONSE: The PSC incorporates by reference the general objections stated above. The PSC further objects to this request to the extent it is vague, unduly burdensome and requests that Dr. Saed prepare documents in response to the request. Notwithstanding the aforementioned, Dr. Saed will produce at his deposition copies of all laboratory notebooks related to the research referred to on pages 13-21 of his report.

27. any and all measurements and/or data supporting the claim that "The molecular effects resulting from Johnson's Baby Powder exposure exhibit a clear dose-response pattern";

RESPONSE: The PSC incorporate by reference the general objections stated above. Notwithstanding the aforementioned, Dr. Saed will produce at his deposition copies of all laboratory notebooks related to the research referred to on pages 13-21 of his report.

28. any and all measurements and/or data in the experimental studies referred to on pages 13-21 of the report supporting the claim that "Johnson's Baby Powder can cause ovarian cancer";

RESPONSE: The PSC incorporates by reference the general objections stated above. Notwithstanding the aforementioned, Dr. Saed will produce at his deposition copies of all laboratory notebooks related to the research referred to on pages 13-21 of his report.

29. any and all measurements and/or data in the experimental studies referred to on pages 13-21 of the report supporting the claim that "Johnson's Baby Powder worsens the prognosis for patients with ovarian cancer."

RESPONSE: The PSC incorporates by reference the general objections stated above. Notwithstanding the aforementioned, Dr. Saed will produce at his deposition copies of all laboratory notebooks related to the research referred to on pages 13-21 of his report.

3. Documents reflecting the amount of funding received by You and the identity of the sources from which such funding was received for all experiments or other research that You have conducted regarding talc and ovarian cancer (whether published or unpublished), including but not limited to the Harper/Saed 2018 Abstract identified in Paragraph 1 above and the experiments referenced identified in Paragraph 2 above.

RESPONSE: The PSC incorporates by reference the general objections stated above. The PSC further objects to this request to the extent the term "funding" is vague and ambiguous. Notwithstanding the aforementioned, Dr. Saed will produce at his deposition copies of documents reflecting the costs associated with his experiments and other research regarding talc and ovarian cancer.

Dated: December 20, 2018

Respectfully Submitted,

s/ Michelle A. Parfitt

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Plaintiffs' Liaison Counsel

CERTIFICATE OF SERVICE

We hereby certify that on this 20th day of December, 2018, the Defendants identified below were served a true and correct copy of the Plaintiffs' Steering Committee's Response and Objections to the Notice of Oral and Videotaped Deposition of Ghassan M. Saed, Ph.D and Duces Tecum by electronic mail:

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Respectfully submitted,

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